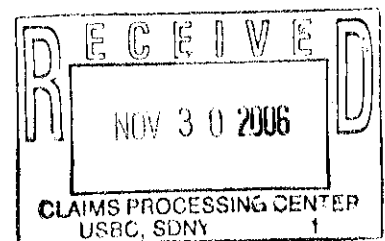


UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**MOTION FOR REQUEST OF EXTENSION OF TIME TO
FILE RESPONSE TO OBJECTION TO PROOF OF CLAIM**

1. On or about July 18, 2006 Woco Industrietechnik GmbH filed a Proof of Claim in this matter for the amount of \$80,563.84 Euros (equivalent to \$100,883.41 as of 7-17-06). (See Proof of Claim, Exhibit 1).
2. Debtor has objected to said Proof of Claim on the basis of "insufficient documentation".
3. The time period for filing a response to Debtor's Objection was Thanksgiving Thursday, November 24, 2006.
4. Prior to the filing deadline, the undersigned attempted to contact Debtor's counsel to resolve any outstanding issues and to provide supporting documentation which would resolve the necessity for having an objection to Woco Industrietechnik GmbH's Proof of Claim.
5. It was not until Monday, November 27, 2006, that the undersigned was finally able to speak to Debtor's counsel and provide the supporting documentation to the Proof of Claim.



6. Despite the fact that supporting documentation was provided, Debtor's counsel has failed and refused to set aside its current Objection.

7. Further, even though Debtor's counsel has received and reviewed the supporting documentation of Woco Industrietechnik GmbH's Proof of Claim, it has failed and refused to allow an extension of time to file a response to its Objection to Claim.

8. As the filing deadline for the response to Debtor's Objection took place on a national holiday, and as the undersigned attempted in good faith to confer with Debtor's counsel to resolve any issues raising its Objection to Woco Industrietechnik GmbH's Proof of Claim, good cause exists to allow Woco Industrietechnik GmbH to file a late Response to Objection.

9. Woco Industrietechnik GmbH's Response to Objection to Claim was filed contemporaneously with this instant Motion.

WHEREFORE, Woco Industrietechnik GmbH respectfully requests this Honorable Court grant its Motion for Request of Extension of Time to File Response to

Objection to Proof of Claim and allow Woco Industrietechnik GmbH's Response to
Objection to Claim.

Respectfully submitted,

**SULLIVAN, WARD,
ASHER & PATTON, P.C.**

By: 

SETH P. TOMPKINS (P63249)
Attorney for Woco Industrietechnik GmbH
1000 Maccabees Center
25800 Northwestern Highway
Southfield, MI 48075-1000
(248) 746-0700

Dated: November 28, 2006

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2006, I served a copy of Woco
Industrietechnik GmbH's Motion for Request of Extension of Time to File Response to
Objection to Proof of Claim, Response to Objection to Claim and this Certificate of
Service by overnight courier on the following individuals:

Honorable Robert D. Drain, Judge of the U.S. Bankruptcy Court,
Southern District of New York, One Bowling Green, New York, NY
10004-1408;

Delphi Corporation, Attn: General Counsel, 5725 Delphi Dr., Troy, MI 48098;

John Wm. Butler, Jr, Esq., Skadden, Aprs, Slate, Meagher & Flom, LLP, 333
W. Wacker Dr., Ste. 2100, Chicago, IL 60606 ~~Four Times Square, New York, NY
10036;~~

Kenneth S. Ziman, Esq., Simpson, Thacher & Bartlett, LLC, 425 Lexington
Ave., New York, NY 10017;

Davis, Polk & Wardell, Attn: Donald Bernstein & Brian Resnick, 450 Lexington
Ave., New York, NY 10017;

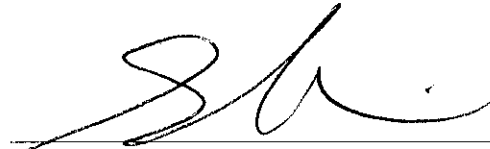
Robert J. Rosenberg & Mark A. Broude, Lathan & Watkins, LLP, 885 Third Ave,
New York, NY 10022;

Ms. Bonnie Steingart, Fried, Frank, Harris, Shriver & Jacobson, LLP, One New
York Plaza, New York, NY 10004

Ms.Alicia M. Leonhard, Office of the United States Trustee for the Southern
District of New York, 33 Whitehall St., Suite 2100, New York, NY 10004

and depositing the envelope(s) with Federal Express with all fees for overnight delivery
thereon fully prepaid.

I hereby declare that the statement above is true to the best of my knowledge,
information and belief.

A handwritten signature in black ink, appearing to read 'S. Tompkins', is written over a horizontal line.

Seth P. Tompkins, P63249
Attorney for Woco Industrietechnik GmbH
1000 Maccabees Center
25800 Northwestern Highway
Southfield, MI 48075-1000
(248) 746-0700

Dated: November 28, 2006